

# **Iowa Department of Natural Resources**

## **Draft Title V Operating Permit Fact Sheet**

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

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The Iowa Department of Natural Resources (DNR) finds that:

1. Moveero - Estherville, located at 2420 7th Avenue South, Estherville, Iowa 51334 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Mike Wodke.
2. Moveero - Estherville is a Motor Vehicle Rim and Hub Manufacturer. This facility consists of 34 emission units with potential emissions of:

<b>Pollutant</b>	<b>Abbreviation</b>	<b>Potential Emissions (Tons per Year)</b>
Particulate Matter ( $\leq 2.5 \mu\text{m}$ )	PM <sub>2.5</sub>	23.47
Particulate Matter ( $\leq 10 \mu\text{m}$ )	PM <sub>10</sub>	28.99
Particulate Matter	PM	44.95
Sulfur Dioxide	SO <sub>2</sub>	0.05
Nitrogen Oxides	NO <sub>x</sub>	7.87
Volatile Organic Compounds	VOC	228.08
Carbon Monoxide	CO	6.65
Lead	Lead	0
Hazardous Air Pollutants <sup>(1)</sup>	HAP	68.17

<sup>(1)</sup> May include the following: Nickel, chromium, hexane, & manganese.

3. Moveero - Estherville submitted a Title V Operating Permit renewal application on September 15, 2021 and any additional information describing the facility on December 13, 2021. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
4. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

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DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from March 17, 2022 through April 16, 2022. During the public comment period, anyone may submit written comments on the permit. Mail signed comments to Zane Peters at the DNR address shown below. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Zane Peters at the DNR address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

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DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

## Title V Application Review Notes

Applicant:	<b>Moveero - Estherville</b>
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
City:	Estherville
County:	Emmet (FO #3)
EIQ#:	92-6803
Facility#:	32-01-016
Permit #:	99-TV-019R4
Reviewer:	Zane Peters
Date:	3/10/22

### **Facility Identification**

Facility Name:	Moveero - Estherville
Facility Location:	2420 7 <sup>th</sup> Avenue South, Estherville, IA 51334
Responsible Official:	Mike Wodke
Phone:	(712) 260-1597

### **Background**

Moveero - Estherville manufactures motor vehicle rims and hubs. Emission units at the facility include Paint booths, welders, grinders, washers, and drying ovens.

### **Regulatory Status**

Moveero - Estherville is a major source for Title V. See Table 1 major source by pollutant.

**Table 1**  
**Title V Major Source by Pollutant**

<b>Pollutant</b>	<b>Major For</b>
PM <sub>10</sub>	<input type="checkbox"/>
SO <sub>2</sub>	<input type="checkbox"/>
NO <sub>x</sub>	<input type="checkbox"/>
VOC	<input checked="" type="checkbox"/>
CO	<input type="checkbox"/>
Lead	<input type="checkbox"/>
Individual HAP	<input type="checkbox"/>
Total HAP	<input checked="" type="checkbox"/>

**Program Applicability:**

- PSD: NO
- Part 61 NESHAP: NO
- NSPS: NO
- Part 63 NESHAP: YES. See Table 2.

**Table 2**  
**Part 63 NESHAP Applicability**

EP	EU	Source Description	Permit #	NESHAP Subparts
5	5	Two Stage Washer	98-A-1148-S3	A, MMMM
5-2		Two Stage Washer	16-A-424-S1	
23	23	Multi-Stage Washer	98-A-1149-S4	
24		Multi-Stage Washer	16-A-425-S1	
6	6	Top Coat Booth #1	93-A-531-S5	
67	67	EM Washer	21-A-307	
15	15	E-Coat System	97-A-344-S2	
22			98-A-1147-S1	
47	47	Paint Kitchen	99-A-1066-S1	
50	50	Topcoat Paint Booth #2	04-A-605-S1	
62	17	E-Coat Oven	10-A-406	
	17a	E-Coat Oven		
	30	Top Coat Oven		
	31a	Top Coat Oven		
65	65	Generator (65 HP)	NA	A, ZZZZ

- Acid Rain: NO
- Stratospheric Ozone Protection: NO
- Prevention of Accidental Releases: NO
- CAM: NO

### **Periodic Monitoring Evaluation**

All periodic monitoring requirements are in accordance with the Department's Periodic Monitoring Guidance Document.

The periodic monitoring evaluation indicates facility O&M for the controlled emission units shown in Table 3.

**Table 3  
O&M Plans Indicated**

<b>EP</b>	<b>EU</b>	<b>Emission Unit Description</b>	<b>Control Equipment</b>
6	6	Top Coat Booth #1	ATI Blanket/Bagfilter
50	50	Topcoat Paint Booth #2	Mat Filter

In accordance with the department's paint booth policy, an Agency O&M Plan is required at EP 6 and EP 50.

### **Stack Testing**

There are not any stack tests required in the draft permit.

### **Compliance Status**

The facility is in compliance.

### **Changes Made To the Title V Permit Since the Previous Issuance**

#### **General Changes**

- Updated Responsible Official and Permit Contact Person (pp.1)
- Updated Equipment List (pp. 4-5)
- Updated Plant-Wide Conditions (pp. 6-8)
- Updated General Conditions (pp. 54)

#### **Emission Point-Specific Changes**

- EPs 5-67 CAP – EP-67 added to the permit. Particulate matter emission limits updated (pp. 9-12)
- EP 14 – Stack height updated (pp. 20)
- EP 36 REMOVED from the permit in accordance with the rescission of Iowa DNR Construction Permit 99-A-1064-S3
- EP-39 – Particulate matter limit and exhaust flow rate updated (pp. 32)
- EP-47 – Stack opening updated (pp. 34)
- EP-49 - Operational Requirements with Associated Monitoring and Recordkeeping section updated (pp. 37)
- EU 64-2 REMOVED from the permit.